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November 8, 2017

Luly Massaro Clerk Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

Re:

Providence Water Supply Board

Docket No. 4618

Dear Luly:

Enclosed for filing are an original and nine copies of Providence Water Supply Board's Objection to Bristol County Water Authority Data Request 1-4(g).

If you have any questions, please feel free to call.

Very truly yours,

Michael R. McElroy

MRMc:tmg

cc: Service List

PWSB/Revenue Reserve/Objection to BCWA DR 1-4

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE WATER SUPPLY BOARD

DOCKET No. 4618

PROVIDENCE WATER SUPPLY BOARD'S MOTION OBJECTING TO BRISTOL COUNTY WATER AUTHORITY'S DATA REQUEST 1-4(g)

Providence Water Supply Board ("Providence Water") files this Motion objecting to

Bristol County Water Authority's ("BCWA") Data Request BCWA 1-4(g).

BCWA 1-4(g) asks:

"Please explain what Providence did with the extra revenue collected in Fiscal

Years 2011, 2012, 2014 and 2015."

The Fiscal Years 2011, 2012, 2014, and 2015 are all prior to Providence Water's last rate

cases, Dockets 4571 (Order issued September 11, 2015) and 4618 (Open Meeting Decision on

February 20, 2017).

The events which occurred in Fiscal Years 2011, 2012, 2014, and 2015 are not in any way

relevant or material to the filing in this docket, which deals with a proposed transfer from

Providence Water's restricted revenue account due to declining consumption in its most recent

fiscal year (2017), as compared to the consumptions projected in PUC Dockets 4571 and 4618.

This Commission ruled in Docket 4061 in Report and Order 20160 (page 20) that the

restricted revenue reserve may be used "to cover shortfalls in allowed revenues upon a showing

by Providence Water Supply Board that the shortfall resulted from reduced consumption." The

most recent projected consumptions used to establish rates were set by the PUC in Dockets 4571

and 4618. A revenue reserve filing should not be used as a vehicle by an intervenor to go back

and attempt to re-litigate matters which have already been litigated in closed dockets.

Therefore, Providence Water objects to BCWA 1-4(g).

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Respectfully submitted,

PROVIDENCE WATER SUPPLY BOARD

By its attorney

Date: November 8, 2017

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of November, 2017, I sent a copy of the foregoing to the service list.

Theresa Gallo
Theresa Gallo

PWSB/Revenue Reserve/Objection to BCWA DR 1-4

Docket No. 4618 - Providence Water Supply Board - General Rate Filing Service List updated 12/27/16

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